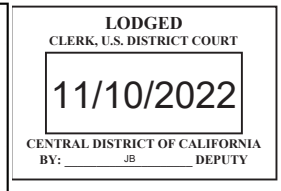
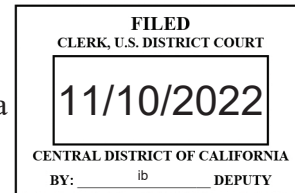


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

EZEQUIEL IBARRA, aka "Kurupt,"

Defendant

Case No. 2:22-mj-04476-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of October 2, 2022, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of Ammunition

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/ S /

Complainant's signature

Hannah Monroe, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 11/10/2022

Judge's signature

City and state: Los Angeles, California

Hon. Alexander F. MacKinnon, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Hannah Monroe, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Ezequiel Ibarra, aka "Kurupt," ("IBARRA") for a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of Ammunition.

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for approximately seven years. Before becoming a Special Agent, I was a Staff Operations Specialist with the FBI for approximately two and a half years. I am currently a member of the FBI's violent crime major offenders squad in Long Beach, California.

4. Since joining the FBI in 2014, I have received training in the investigation of violations of criminal law,

such as drug-trafficking, firearms offenses, computer-related crimes, and financial fraud, including several hundred hours of formal training at the FBI Training Academy in Quantico, Virginia. I also have participated in investigations relating to organized crime, home-grown violent extremism, access device fraud, identity theft, narcotics, and computer intrusions. I have participated in many aspects of criminal investigations including the issuance of subpoenas, reviewing evidence, conducting electronic and physical surveillance, working with informants, and the execution of search and arrest warrants. Additionally, I have interviewed and/or debriefed informants and other witnesses who had personal knowledge regarding the subject matters of the investigations in which I have been involved, including narcotics and firearms offenses.

III. SUMMARY OF PROBABLE CAUSE

5. On or about October 1, 2022, at approximately 6:35 p.m., Los Angeles Police Department ("LAPD") officers received a report of a stolen black 2018 BMW 530E bearing California license plate "ARMNAN," (the "BMW").

6. The next day, on October 2, 2022, at approximately 10:15 p.m., officers responded to a radio call reporting that the BMW was parked on a street in Wilmington, California for thirty minutes. While en route, officers observed a car matching the BMW's description and bearing the same license plate reported in the radio call. Accordingly, the officers followed the BMW, executed a traffic stop, and ordered all of

the occupants out of the car. IBARRA, a convicted felon, exited the front passenger seat of the BMW.

7. The LAPD officers searched the BMW and found 20 rounds of live ammunition in a grey bag in the front passenger seat. The bag also contained a handwritten note inside a wallet with "Kurupt2000" and "Kurupt23." After being Mirandized, IBARRA acknowledged that his moniker was "Kurupt." While being transported, IBARRA asked if the officers could give his grey bag to another passenger.

8. Before possessing the ammunition in his grey bag, IBARRA had sustained five convictions for felony crimes. On November 7, 2022, a certified ATF interstate nexus expert determined that the ammunition traveled in and affected interstate commerce.

IV. STATEMENT OF PROBABLE CAUSE

9. Based on my training and experience, my review of the investigative reports submitted in this investigation, my participation in this investigation, and my conversations with law enforcement officers regarding this investigation and those officers present during IBARRA's arrest, I know the following information:

A. V.M. Reports that His BMW was Stolen

10. On or about October 1, 2022, at 6:35 p.m., V.M. and his mother came to LAPD North Hollywood Station and reported that V.M.'s mother's black 2018 BMW 530E, with VIN WBAJA9C5XJB032941 and bearing California license plate "ARMNAN," was stolen. Specifically, V.M., who is the primary driver of

the BMW, reported that he/she came home around 1:00 p.m., and that a woman named Esabella Rizo ("Rizo"), arrived shortly thereafter. V.M. left his keys and phone in the BMW while he spoke with Rizo and another male. When V.M. was distracted, Rizo entered the BMW and drove off. V.M. did not give her permission to take the BMW.

11. V.M. reported that he was not familiar with Rizo and that he had only known her through social media for approximately three months. V.M.'s brother reached out to Rizo via Facebook messenger and asked for the car to be returned. V.M.'s brother did not get a response, and the message did not show that it had been read by Rizo. According to V.M., he tracked his phone, which was in the BMW, to a motel in Wilmington, and a staff member of the motel reported that they observed the BMW and that the woman who drove it checked out earlier in the day.¹

B. IBARRA, a Convicted Felon, is Arrested as a Passenger in the Stolen BMW

12. Based on my review of LAPD reports, I know that on or about October 2, 2022, at approximately 10:15 p.m., LAPD officers Dumaplin and Castillo-Munoz were on routine patrol in Wilmington. Officers Dumaplin and Castillo-Munoz received a radio call reporting a stolen vehicle parked on East Colon Street for the past thirty minutes. The radio call described

¹ On November 7, 2022, an LAPD officer visited the motel and learned that neither Rizo nor any other occupants of the BMW had checked into the motel.

the stolen vehicle as a black 2018 BMW 530E, with VIN WBAJA9C5XJB032941 and bearing California license plate "ARMNAN."

13. According to LAPD reports, Officers Dumaplin and Castillo-Munoz drove eastbound to East Colon Street, and Officer Dumaplin saw a BMW, facing westbound, matching the description that she heard over the radio. Officer Dumaplin made a U-turn and then she saw the rear lights go on and a license plate that read "ARMNAN."

14. According to LAPD reports, Officers Dumaplin and Castillo-Munoz followed the BMW and requested additional officers to respond to the area. Officer Dumaplin activated her emergency lights and siren and initiated a traffic stop of the BMW.

15. According to LAPD reports, after the car stopped, LAPD officers then ordered the occupants out of the car. A female driver, later identified as Rizo, exited the driver seat.² IBARRA exited the front passenger seat. A male, later identified as Victor Pantoja Andrade ("Andrade"), exited the rear passenger seat. All were taken into custody without incident.

16. According to LAPD reports, Officer Tallakson, who had arrived on scene to assist, interviewed IBARRA. Officer Tallakson asked if IBARRA was on probation, and IBARRA ultimately stated that he believed he was on probation for

² During the traffic stop, Rizo told officers her name was Sylvia, but then IBARRA told officers her name was Esabella. During the stop, Rizo responded to Esabella and Sylvia.

criminal threats. Officer Tallakson then read IBARRA his Miranda rights, and IBARRA verbally confirmed that he understood his rights. Officer Tallakson then asked IBARRA for basic biographical information. During that questioning, IBARRA acknowledged that his moniker was "Kurupt."

17. According to LAPD reports, Officer Del Pino overheard IBARRA say that his moniker was "Kurupt," and recognized him from IBARRA's prior law enforcement contacts.³ Officer Del Pino asked IBARRA questions about his prior law enforcement contacts, and IBARRA acknowledged that he had been in jail for over a year for a prior offense. IBARRA further stated that he was driving in the car with his girlfriend and said her name was "Esabella" and then "Sylvia." He also said that the BMW was her car.

C. IBARRA's Grey Bag Contained 20 Rounds of Live Ammunition

18. Before impounding the stolen vehicle, Officer Dumaplin conducted an inventory search of the BMW. She found the car keys between the driver seat and the center console and drug paraphernalia -- namely, a glass pipe commonly used for smoking methamphetamine with a white cloudy substance on the glass -- in plain view on the front passenger seat.

³ In December 2020, LAPD and the FBI initiated an investigation into drug trafficking organizations operating out of the Harbor Area of Los Angeles, California. In particular, LAPD and FBI are investigating gang "shot-callers" and influential members of the Westside Wilmas street gang who are believed to be involved in a host of illicit activities including drug trafficking, weapons trafficking, assaults, and other violent acts. This investigation has identified numerous prominent members of the gang to include IBARRA, aka "Kurupt."

19. Officer Dumaplin then discovered a closed grey backpack on the front passenger floorboard, where IBARRA had exited the BMW. Officer Dumaplin unzipped the backpack, shined her flashlight, and saw a clear plastic baggie with 20 live rounds of ammunition. Another officer searched the bag and found a handwritten note inside a wallet with the username of "Kurupt2000" and "Kurupt23."

20. Meanwhile, Officer Batongmalaque checked if IBARRA had any outstanding warrants for his arrest, and saw that IBARRA was on parole and had a felony outstanding arrest warrant for a parole violation.

21. Officer Dumaplin asked IBARRA if he wanted his bag from the BMW, and IBARRA initially claimed he did not have anything inside the BMW. However, while being transported, IBARRA asked Officer Del Pino if the bag could be released to Andrade, the rear passenger, and he identified his bag as the grey bag.

D. IBARRA Acknowledges that He Was Found with Ammunition on a Jail Call

22. Based on my conversations with law enforcement who reviewed IBARRA's jail calls, IBARRA placed three jail calls using a pin number that jail staff provided him.

23. On one call, IBARRA acknowledged that he possessed the ammunition found in the BMW. Specifically, on October 3, 2022, IBARRA, identifying himself as "Ezequiel," called an unknown male. The unknown male asked IBARRA what he was arrested for, and IBARRA stated, "the parole hold, basically, and fuckin

ammunition." In response, the unknown male asked, "they got you with those things?," and IBARRA responded, "Yea." IBARRA continued, stating that he was trying to "drop them off" to someone, referring to the ammunition.

E. IBARRA is a Convicted Felon

24. On or about November 6, 2022, I reviewed IBARRA's conviction documents and learned that he has been convicted of the following felony crimes punishable by a term of imprisonment exceeding one year:

a. On or about May 6, 2022, a violation of California Penal Code Section 422: Criminal Threats, in the Superior Court for the State of California, County of Los Angeles, Case Number NA116998;

b. On or about May 6, 2022, a violation of California Penal Code Section 29800(A)(1): Ex-con with Firearm, in the Superior Court for the State of California, County of Los Angeles, Case Number NA116958;

c. On or about January 7, 2021, a violation of California Penal Code Section 30305(A)(1): Ex-con in Possession of Ammunition, in the Superior Court for the State of California, County of Los Angeles, Case Number VA1538828;

d. On or about March 13, 2019, a violation of California Vehicle Code Section 10851: Driving or Taking a Vehicle Without Consent, in the Superior Court for the State of California, County of Los Angeles, Case Number NA111405; and

e. On or about May 1, 2018, a violation of California Penal Code Section 496: Receiving Stolen Property, in

the Superior Court for the State of California, County of Los Angeles, Case Number NA109044.

F. Interstate Nexus

25. On November 7, 2022, LAPD Task Force Officer Christopher Lindberg, a certified ATF interstate nexus expert, examined the ammunition and confirmed that the ammunition was manufactured outside of the State of California. Because the ammunition was found in California, I believe that it has traveled in and affected interstate commerce.

V. CONCLUSION

26. For all of the reasons described above, there is probable cause to believe that IBARRA has committed a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of Ammunition.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 10th day of November, 2022.

A handwritten signature in black ink, appearing to read "Alex Mackinnon", with a horizontal line extending from the end of the signature.

HONORABLE ALEXANDER F. MACKINNON
UNITED STATES MAGISTRATE JUDGE